

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Daniel Corrigan
Jennifer Fox-Corrigan aka Jennifer Fox
Debtor(s)

CHAPTER 13

Lakeview Loan Servicing, LLC
Movant

vs.

NO. 18-14784 MDC

Daniel Corrigan
Jennifer Fox-Corrigan aka Jennifer Fox
Debtor(s)

Kenneth E. West Esq.
Trustee

11 U.S.C. Section 362

**MOTION OF Lakeview Loan Servicing, LLC
TO APPROVE PARTIAL CLAIM**

1. The Movant is Lakeview Loan Servicing, LLC.
2. Debtor(s) is/are the owner(s) of the premises 1036 Sunset Street, Trainer, PA 19061, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$93,177.00 on the mortgaged premises that was executed on July 24, 2012. Said mortgage was recorded on July 9, 2012 at Book 5161, Page 1070. The Mortgage was subsequently assigned to Movant by way of Assignment of Mortgage recorded on August 22, 2018, at Book 06212, Page 1863 in Delaware County.
4. Kenneth E. West Esq., is the Trustee appointed by the Court.
5. Debtor has applied and been approved for a Partial Claim Agreement with Movant. The Partial Claim is attached hereto as Exhibit "A".
6. Movant seeks Court approval of the Partial Claim by way of the within Motion.
7. Approval and recordation (if applicable) of the Partial Claim shall not constitute a violation of the automatic stay.
8. Upon Court approval of the within Motion, Movant shall file an Amended Proof of Claim to reflect the Loan Modification within thirty (30) days of the entry of any such Order.

WHEREFORE, Movant prays that an Order be entered approving the Partial Claim Agreement and allowing for the recordation of such agreement (if applicable).

/s/ Rebecca A. Solarz, Esquire

Rebecca A. Solarz, Esquire

Attorneys for Movant/Applicant

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